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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF RYAN SILA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
EXHIBIT TO SUPPLEMENTAL AZARI
DECLARATION**

Judge: Hon. Richard Seeborg
Courtroom 3 – 17th Floor

DECLARATION OF RYAN SILA

I, Ryan Sila, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* for this case. Dkt. 232. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs' administrative motion to seal Exhibit 1 to the Supplemental Declaration of Cameron R. Azari Regarding the Implementation and Adequacy of the Class Notice Plan and Notices. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

3. Plaintiffs respectfully request that the Court seal portions of Exhibit 1, which is attached to the supplemental Azari declaration.

4. The information requested to be sealed reveals the names, email addresses, and other information regarding individuals who submitted requests to be excluded from the certified classes in this case.

5. If the Court were to deny sealing this information, these individuals could be subjected to a heightened risk of injury, including identity theft.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 2nd day of April, 2025, at New York, New York.

/s/ Ryan Sila